

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual,

Plaintiff,

Civil Action No. 1:24-CV-24228-CMA

v.

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.

JOINT [PROPOSED] VERDICT FORM

Pursuant to the Court's Amended Case Management and Scheduling Order (ECF 62), Plaintiff Megan Pete ("Ms. Pete") and Defendant Milagro Cooper ("Ms. Cooper") respectfully submits their proposed verdict form.

The parties respectfully reserve the right to amend their proposed verdict form prior to the time it is given to the jury, depending on the evidence received at trial, the Court's rulings, or any other factors that preclude a definitive submission at this time.

Dated: Miami, FL
November 25, 2025

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In answering the following questions and filling out this Verdict Form, you are to follow the Court's Final Instructions to the Jury and any instructions provided in this Verdict Form. Your answer to each of the following must be unanimous.

We, the jury, unanimously answer the questions submitted to us as follows:

I. **MS. PETE'S CLAIMS**

COUNT ONE: DEFAMATION PER SE

Question 1: Do you find, by a preponderance of the evidence, that Ms. Cooper defamed Ms. Pete by accusing Ms. Pete of perjury—a felony—by lying under oath in a criminal trial?

Yes _____

No _____

If your answer to question 1 is “Yes,” continue to Question 2, if the answer is “No,” proceed to “Count Two: Promotion of An Altered Sexual Depiction.”

Question 2: Do you find, by a preponderance of the evidence, that Ms. Cooper provides disinterested and neutral commentary, rather than advocacy for a particular client or personal interest?

Yes _____

No _____

Regardless of your answer to question 2 continue to Question 3.

Question 3: Do you find, by a preponderance of the evidence, that Ms. Cooper regularly disseminates news or information to the public, rather than making isolated or one-time publications?

Yes _____

No _____

Regardless of your answer to question 3 continue to Question 4.

Question 4: Do you find, by a preponderance of the evidence, that Ms. Cooper impartially disseminates information, rather than acting primarily to promote their own business, products, or services?

Yes _____

No _____

Regardless of your answer to question 4 continue to Question 5.

Question 5: Do you find, by a preponderance of the evidence, that Ms. Cooper operates for the purpose of informing the public about matters of public concern through news reporting, analysis, or commentary?

Yes _____

No _____

Regardless of your answer to question 5 continue to Question 6.

Question 6: Do you find, by a preponderance of the evidence, that Ms. Cooper functions in a similar manner to traditional news media, such as newspapers, magazines, television, radio, or their online equivalents?

Yes _____

No _____

Regardless of your answer to question 6 continue to Question 7.

Question 7: Considering your answers to Questions 2 through 6 together, do you find, by a preponderance of the evidence, that Ms. Cooper should be treated as a media defendant, with associated privileges?

Yes _____

No _____

Regardless of your answer to question 7 continue to Question 8.

Question 8: Do you find, by a preponderance of the evidence, that Ms. Cooper's defamatory statements caused Ms. Pete harm?

Yes _____

No _____

Regardless of your answer to question 8, proceed to Count Two: Promotion of an Altered Sexual Depiction.

COUNT TWO: PROMOTION OF AN ALTERED SEXUAL DEPICTION

Question 9: Do you find, by a preponderance of the evidence, that Ms. Cooper willfully and maliciously promoted, without Ms. Pete's consent, a visual depiction of Ms. Pete that she knew or reasonably should have known was an altered sexual depiction?

Yes _____

No _____

Regardless of whether your answer is "Yes" or "No," proceed to "Count Three: Intentional Infliction of Emotional Distress."

COUNT THREE: INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS

Question 10: Do you find, by a preponderance of the evidence, that Ms. Cooper intentionally or recklessly engaged in extreme and outrageous conduct toward Ms. Pete?

Yes _____

No _____

If your answer is "Yes," proceed to the next question. If your answer is "No," skip the remaining question under "Count Three: Intentional Infliction of Emotional Distress," and proceed to "Damages."

Question 11: Do you find, by a preponderance of the evidence, that Ms. Pete suffered severe emotional distress as a result of Ms. Cooper's extreme and outrageous conduct?

Yes _____

No _____

DAMAGES

If you answered "Yes" to Question 1, 8, 9, or Questions 10 & 11, proceed to the next question. If your answer is "No," skip the questions under "Damages," and sign the Verdict Form.

Question 12: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded compensatory damages against Ms. Cooper?

Yes _____

No _____

If your answer is "Yes," in what amount: _____

Question 12(a): If your answer is "Yes," in what amount do you award for Defamation per se: _____

Question 12(b): If your answer is "Yes," to Question 12 in what amount do you award for Promotion of an Altered Sexual Depiction: _____

Question 12(c): If your answer is "Yes," to Question 12 in what amount do you award for Intentional Infliction of Emotional Distress: _____

If you answered "No" to Question 12, proceed to the Question 13. If you answered "Yes" to Question 12, skip Question 13 and proceed to Question 14.

Question 13: If you found that Ms. Pete is not entitled to compensatory damages, do you find, by a preponderance of the evidence, that Ms. Pete should be awarded nominal damages against Ms. Cooper?

Yes _____

No _____

If your answer is "Yes," in what amount: _____

Regardless of whether your answer is "Yes" or "No," proceed to the next question.

Question 14: Do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete's defamation claim?

Yes _____ No _____

If your answer is "Yes," in what amount: _____

Regardless of whether your answer is "Yes" or "No," proceed to the next question.

Question 15: Do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete's intentional infliction of emotional distress claim?

Yes _____ No _____

If your answer is "Yes," in what amount: _____

Signed: _____

Presiding Juror

Dated: _____

You are finished. Please ensure the Verdict Form accurately reflects your unanimous decisions. Once signed by the Jury Foreperson, please notify the Court's Clerk that you have

reached a verdict. The Jury Foreperson should maintain possession of this Verdict Form and bring it when the jury is brought back into the Courtroom.